

# Bloomsbury Football Foundation Safeguarding Children, Young People and Adults Policy



# **Contents**

CONTEXT	4
STATEMENTS AND AIMS	4
POLICY STATEMENT	4
EQUAL OPPORTUNITIES STATEMENT	4
POLICY AIM	
SAFEGUARDING PERSONNEL	5
Lead and Deputy for Safeguarding	5
LINE OF ACCOUNTABILITY FOR SAFEGUARDING	7
SENIOR LEAD FOR SAFEGUARDING	7
WHY DO WE NEED A SAFEGUARDING POLICY?	7
DEFINITIONS	8
DEFINITION OF A CHILD/YOUNG PERSON	8
DEFINITION OF AN ADULT AT RISK	8
RELATED POLICIES	8
Data Protection	8
CONFIDENTIALITY	8
Whistleblowing	9
Information Sharing	10
Safer Recruitment	10
STATEMENT ON DISCLOSURE AND BARRING SERVICE (DBS) CHECKS	10
INDUCTION AND TRAINING	11
WORKING PRACTICES	11
CONSENT	11
STAFF RATIOS TO CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK	11
LONE AND ONE TO ONE WORKING	12
BF DOES NOT DO HOME VISITS	12
YOUNG PEOPLE WHO WORK IN OUR ORGANISATION	12
CODES OF CONDUCT - BF FOLLOWS THE FA CODE OF CONDUCT	12
RECOGNISING ABUSE IN CHILDREN YOUNG PEOPLE AND ADULTS AT RISK	13
HANDLING DISCLOSURES	14
RESPONDING TO CONCERNS	16
RECORD KEEPING	18
HANDLING ALLEGATIONS / DEALING WITH COMPLAINTS / DISCIPLINARY & GRIEVANCE PROCEDURES	18
AND REPORTING INDIVIDUAL PERSONNEL TO THE DBS AND, IF A REGISTERED FA COACH, TO THE FA WHEN REQUESTED BY THE LADO	19



BULLYING AND HARASSMENT	19
ESAFETY	19
Why do we need to include esafety?	19
ESAFETY CODE OF CONDUCT:	20
What are the Risks?	20
What else might be of concern?	20
WHAT DO I DO IF I AM CONCERNED?	21
eSafety Referral Flowchart — Child and Adult	22
MINIMISING THE RISKS	24
SAFEGUARDING PRACTICAL GUIDANCE	24
PHOTOGRAPHY & FILMING GUIDANCE	24
Transport	25
ACTIVITIES, EVENTS AND VISITING SPEAKERS/ACTIVITY LEADERS	26
THE LATE PICK UP OF A CHILD, YOUNG PERSON OR ADULT AT RISK	26
CHILD, YOUNG PERSON OR ADULT GOES MISSING	26
First Aid	27
BUILDINGS AND VENUES	27
Ethical fundraising	27
SAFECIC RECOMMENDATIONS	28
POLICY DATE	28
POLICY REVIEW DATE: 03/07/2024	28
DATE OF NEXT DEVIDAY, 02/07/2025	າດ



# Safeguarding Children, Young People and Adults Policy

## **Organisation Name: Bloomsbury Football Foundation**

#### **Context**

- Bloomsbury football foundation (BFF) is a registered charity in England and Wales, 1178842.
- BFF operates in the UK.
- BFF delivers football sessions to young people.
- BFF works with young people aged 3-18 as well as adults. BFF works in schools and universities.
- We are regulated by the Charity Commission and Ofsted.
- We have 27 employees and a fluctuating number of contractor coaches, around 40.
- We engage over 5,000 young people per week.

#### Statements and Aims

#### **Policy Statement**

We recognise that the welfare of all children, young people and adults at risk, is paramount and that *all* have equal rights of protection. We have a duty of care when they are in our charge, and we will do everything we can to provide a safe and caring environment whilst they attend our activities.

#### **Equal Opportunities Statement**

We recognise that anyone can become subject to discrimination, harassment or victimisation because of:

- age
- culture
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity,
- race
- religion or belief
- sex



#### sexual orientation

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Such incidents will be recorded and shared with parents and carers, and the relevant agencies when necessary and appropriate.

#### We will:

- ✓ treat everyone with respect and celebrate their achievements,
- ✓ carefully recruit and select all staff whether paid or unpaid,
- ✓ respond to concerns and allegations appropriately.

When there are concerns about the welfare of any, child, young person or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Lead for Safeguarding (or the Deputy, if the Lead is unavailable).

**Our policy** is approved by (**trustees, DSL group & CEO**) and will be reviewed and updated annually. We will publish and promote this policy to all staff, paid or unpaid, through induction, training and supervision. We endeavour to disseminate, as appropriate, this policy to all who come into contact with our organisation e.g., children, young people, adults at risk, their parents, carers, families and others, such as organisational partners and fundraisers.

#### **Policy Aim**

As members of SAFEcic, we aim at all times to attain best safeguarding practice throughout all our activities with children, young people, adults at risk, their parents, carers and/or families. We endeavour to provide a safe and friendly environment and celebrate all achievements. We will achieve this by adhering strictly to this policy, guidance and risk assessments. Our organisation holds current Public Liability Insurance which covers all our activities.

# **Safeguarding Personnel**

#### **Lead and Deputy for Safeguarding**

**NB** In educational settings the title Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) is used

Our Lead for Safeguarding is:

Name: Peter Marment

Job role: Head of Safeguarding and Governance Contact details: p.marment@bloomsburyfootball.com

Our Deputy Lead for Safeguarding is:

Name: Charlie Hyman

Job role: CEO



Contact details: c.hyman@bloomsburyfootball.com

Our Deputy for Safeguarding is:

Name: Colette Elliot

Job role: Super League Manager

Contact details: c.elliot@bloomsburyfootball.com

Our Deputy for Safeguarding is:

Name: Benedict Barbour Job role: Chief of Staff

Contact details: <u>b.barbour@bloomsburyfootball.com</u>

Our Deputy for Safeguarding is:

Name: Sam Masterson

Job role: Men's and Women's Futsal Coach

Contact details: s.masterson@bloomsburyfootball.com

Our Deputy for Safeguarding is:

Name: Kez Soornack

Job role: Central Region Lead

Contact details: k.soornack@bloomsburyfootball.com

Our Deputy for Safeguarding is:

Name: Esmé Scantlebury

Job role: Refugee & special projects coordinator

Contact details: e.scantlebury@bloomsburyfootball.com

Their role is to oversee and ensure that our safeguarding policy, which includes eSafety, is fully implemented and that we attain SAFEcic standards.

#### Their responsibilities are:

- ✓ monitoring and recording concerns
- ✓ making referrals to social care, or police, as relevant, without delay
- ✓ liaison with other agencies
- ✓ arranging training for all staff

The Deputy for Safeguarding should be available to support or cover for the Lead. S/he will also handle any complaints or allegations against the Lead for Safeguarding if appropriate. It is important that the Lead and Deputy for Safeguarding are unconnected.



#### Line of accountability for safeguarding

The responsibility for safeguarding at board or committee level is shared between members. Safeguarding is on the organisation's risk register, and as an Ofsted and Charity Commission regulated organisation, the organisation has to comply with the PREVENT Duty. A Senior Member of the organisation at Board, Trustee, Governor or similar level should be appointed to take strategic responsibility for the organisation's safeguarding arrangements. This person should be unconnected to the Lead for Safeguarding and Deputy for Safeguarding and should have up to date and relevant training with the ability to develop knowledge, skills and expertise in safeguarding.

#### **Senior Lead for Safeguarding**

Our Senior Lead for Safeguarding is:

Name: Sharon Bennett Job role: Board Trustee

Contact details: <a href="mailto:seabennett@gmail.com">seabennett@gmail.com</a>

# Why do we need a Safeguarding Policy?

All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To undertake these responsibilities, we:

- have (a DSL group of 7 staff alongside a board member) committed to safeguarding
- are clear about peoples' responsibilities and accountability
- have a culture of listening to children, young people and adults at risk
- undertake safer recruitment practices for all staff and volunteers working with children & young people and adults at risk
- have procedures for safeguarding children and young people and adults at risk
- have procedures for dealing with allegations against, and concerns about, any staff
- make sure staff, paid and unpaid, have mandatory induction and further safeguarding training, supervision, reviews and support
- have agreements about working with other organisations and agencies



#### **Definitions**

#### Definition of a child/young person

There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier" (Article1, Convention on the Rights of the Child, 1989).

A child is anyone who has not yet reached their 18th birthday (16th in Scotland).

#### Definition of an adult at risk

An adult at risk is a person over the age of 18 years and is:

- having needs for care and support, and
- experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

#### **Related Policies**

- Anti-bullying policy: Harassment and Bullying.docx
- Intimate care policy: BFF Intimate and Personal Care Policy.docx
- Medicine management policy: BFF Medicine Management Policy and Forms.docx
- Walking home policy: <u>BFF Walking Home Policy and Forms.docx</u>
- Physical contact guidance: <u>5-6-physical-contact-young-people-guidance-grassroots-football-black-and-white-</u>version.pdf
- The FA Respect code of conduct: respect-codes-of-conduct\_fillable.pdf
- Online Safeguarding and E-Policy
- Taking a child to the toilet
- Residential Policy

#### **Data Protection**

We will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law.

#### Confidentiality

This policy is in line with government guidance about confidentiality and these details will be made available to all staff, children, young children, adults at risk, parents and carers.



We fully endorse the principal of the welfare of children, young people and adults at risk, overriding any obligations of confidence we may hold to others. No one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a "need to know" basis.

#### Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way.

Our organisation promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the Lead or Deputy for Safeguarding.

If individuals reporting their concerns within our organisation do not feel they have been acted upon then we support their right to report these concerns to the Local Authority Designated Office (LADO) (England and Wales only) social care services, the police, and / Ofsted & the Charity Commission.

Ofsted complaints form: <a href="https://complain.ofsted.gov.uk/">https://complain.ofsted.gov.uk/</a>

Telephone: 0300 123 1231.

Email: whistleblowing@ofsted.gov.uk

DfE complaints form:

https://form.education.gov.uk/service/Contact\_the\_Department\_for\_Education#

#### **Charity Commission**

https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer

whistleblowing@charitycommission.gov.uk

People can also request support from the charity Protect <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>

or the NSPCC

Call <u>0800 136 663</u> or email <u>help@NSPCC.org.uk</u>. Sport

Footballers who have been sexually abused can call the NSPCC on <u>0800 023 2642</u>.



All media enquiries will be handled by Isabelle Chauzy, Marketing Manager with advise from the Head of Safeguarding Governance.

#### **Information Sharing**

Timely and accurate written records play an essential role in safeguarding individuals, who may have suffered, are suffering or at significant risk of suffering harm. It is important that records are shared at the appropriate time when necessary. Within our organisation the decision to share written information, and with whom, will be undertaken by the Lead or the Deputy for safeguarding

#### Safer Recruitment

Our organisation is committed to safe recruitment in line with the relevant legislation and guidance from government, Ofsted and the Charity Commission for recruiting all staff, paid or unpaid. We do this by:

- advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- obtaining full personal details via an application form (not CVs) with particular relevance to previous work with children, young people and adults at risk
- when a candidate is selected for interview the relevant criminal declaration form will be sent for completion as set out by the Rehabilitation of Offenders Act 1974, as amended
- always taking up two written references, one from the most recent employer or education establishment
- undertaking all interviews face to face, based on the job description
- ensuring at least one person on each interview panel will have undertaken Safer Recruitment training, in line with **Ofsted, DfE** and Charity Commission safe recruitment guidelines.
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- ✓ a satisfactory ID and criminal records check at the appropriate level, including Certificate of Good Conduct for foreign nationals and the <u>International Child Protection Certificate (ICPC)</u> for anyone who has lived in the UK and also travelled overseas
- ✓ a follow up of written references by telephone if relevant to the vacant post
- ✓ a check of essential qualifications
- ✓ confirmation of the Right to Work in the UK for employed personnel
- √ fitness to work as relevant

#### Statement on Disclosure and Barring Service (DBS) Checks

Bloomsbury Football Foundation's policy is to provide a secure and safe environment for all children by requiring all staff members to have an enhanced, up to date clearance from the Disclosure and Barring Service (DBS), which does not have any information declared on it that indicates this person is a threat to



children. In the event volunteers are providing a temporary service, Bloomsbury Football Foundation will undergo a risk assessment for their involvement, they will be required to read and agree to this Safeguarding Policy, and they will be supervised at all times.

# **Induction and Training**

We have a clear induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new staff, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources
- understood the commitment to safeguarding training

When needed, staff will receive further safeguarding training, at the appropriate level, as soon as possible. We also agree a probationary period of **3** months with clear goals and then provide **appraisals** at regular intervals of **6** months with the relevant line manager.

Updated safeguarding training is normally required every 2 years (online) or three years (face to face). Staff working directly with at risk groups will also undertake the free online government training for <a href="PREVENT Channel">PREVENT Channel</a> and <a href="FGM">FGM</a>

# **Working Practices**

#### Consent

When consent is required for any care, activity or intervention we will, unless it is an emergency, obtain consent from the parent/carer or relative for a child, young person or an adult at risk, as defined within.

Where relevant, we will ensure we fulfil our obligations under Child Care Law in terms of parental responsibility and Mental Capacity Legislation on supporting, where possible, the individual's right to make their own decisions. Any decisions made should be the least restrictive and recorded.

#### Staff Ratios to Children, Young People and Adults at Risk

BF will comply with NSPCC recommended ratios and ensure we have carried out risk assessments for any instances where we cannot comply fully with this.



 $\underline{https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children\#article-top$ 

#### Lone and One to One Working

We will avoid lone working, one to one working with children and adults at risk whenever possible to protect both individuals. A risk assessment will always be undertaken to ensure:

- ✓ the care or activity provided is suitable for one to one working,
- ✓ the lone worker has been recruited, trained and supervise to undertake this particular role,
- ✓ that health and safety issues have been identified and recommendations followed,
- ✓ safeguards are in place to protect individual's rights to safe working practice,
- ✓ safeguards are in place in relation to strategies for emergency situations,
- ✓ relevant business insurance is in place for use of personal vehicles
- ✓ accurate and relevant written recording is maintained following any care and activity, signed and dated.

#### **BF does not do Home Visits**

#### Young People who work in our Organisation

All young people who are undertaking volunteer work, apprenticeships or work experience within our organisation/group are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures, observations of possible harm or disturbing behaviour must be reported to the Lead or Deputy immediately.

They will also require an induction program that includes their commitment to safeguarding within the remit of the safeguarding policy and in line with all staff induction.

In addition, information on the young person's contacts recorded as relevant e.g. parents, carers, school representatives and any supervisors, with emergency contact numbers.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working with us and, in the cases of live performances, if a child performance licence is required.

#### Codes of Conduct - BF follows the FA code of conduct

We aim to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. We undertake to:

- ✓ treat all children and young people and adults at risk with respect and dignity
- ✓ ensure that their welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and when using technology
- ✓ ensure any intimate touch required, to carry out care, treatment or training is within relevant NSPCC guidelines and is safe and appropriate. Intimate touch and care will always be part of a plan, agreed with the individual concerned, their parents or carers.
- ✓ always listen to individuals and take account of their wishes and feeling
- √ always act in a professional way and not accept bullying, swearing or other disruptive behaviour



- ✓ liaise openly with parents and carers
- ✓ only use physical contact if absolutely necessary
- ✓ avoid being alone with children, young people and adults at risk whenever possible
- ✓ listen to, and act upon, any disclosures, allegations, or concerns of abuse
- ✓ participate in approved safeguarding training at appropriate levels
- ensure restraint is only used as part of an agreed plan by staff trained in the use of the particular restraint or as an emergency action to protect from harm. All use of restraint will be reported and recorded by the member of staff concerned to the Lead or Deputy for safeguarding and to the relevant manager.
- √ follow our safeguarding policy at all times
- ✓ make activities FUN and enjoyable

**NSPCC** intimate touch guidelines: <a href="https://learning.nspcc.org.uk/safeguarding-child-protection/continence-issues#:":text=care%20%3E%20Intimate%20care-,Intimate%20care,of%20the%20child's%20care%20plan</a>

FA code of conduct: respect-codes-of-conduct\_fillable.pdf

FA physical touch policy: 5-6-physical-contact-young-people-guidance-grassroots-football-black-and-white-

version.pdf

# Recognising Abuse in Children Young People and Adults at Risk

The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what you are observing and being told about an injury consistent with the injury?

- Abuse related to faith or belief
- Alcohol and Substance misuse
- Breast Ironing
- Carrying offensive weapons
- Child criminal and sexual exploitation including County Lines
- Child on child abuse, including sexual violence and upskirting
- Concealed pregnancy
- Criminal exploitation
- Discriminatory
- Domestic violence, including "honour" based abuse
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Forced marriage
- Gangs
- Gambling



- Hate and "mate" crime
- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Trafficking

# **Handling Disclosures**

When a disclosure is made by a child, young person or adult at risk it is important to remember to:

- take what you are being told seriously
- stay calm and reassure
- do not investigate
- do not delay

#### and always

- seek advice from the Lead or Deputy for Safeguarding
- make a careful recording of anything you are told or observe, date and sign.

A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else.







# How to Report a Safeguarding Incident

- 1) If the incident is urgent, please call 999 immediately and, if necessary, deal with the situation using your first aid training.
- 2) If the situation is not urgent and no longer requires your attention, call the DSL Hotline (+44 7700 174021) and select the day you are reporting the incident or (if you cannot call) email <a href="mailto:safeguarding@bloomsburyfootball.com">safeguarding@bloomsburyfootball.com</a>
  - 3) At the end of the session/day please fill out the incident report form sent to you by the DSL.
    - 4) The incident will then be filed and dealt with accordingly ON THE DAY DSL'S ARE ON CALL 8am-10pm

DSL HOTLINE: +44 7700 174021

# **DSL TEAM**



Peter Marment



Kez Soornack



Colette Eliott



Ben Barbour



Esme Scantlebury



Sam Masterson



# **Responding to Concerns**

Safeguarding Referral Flowchart

We ensure and emphasise that everyone in our organisation understand and know how to share any concerns immediately with the Lead or Deputy for Safeguarding. Everyone, including the Lead and Deputy for Safeguarding, will deal with concerns using the following:



#### **Step One:**

If you are worried a child, young person or adult at risk has been abused because:

- you have seen something
- someone says they have been abused
- somebody else has told you they are concerned
- there has been an allegation against a colleague
- there has been an anonymous allegation
- an adult has disclosed that they were abused as a child
- a child, young person or adult say they are abusing someone else.

# **Step Two:**

Check this safeguarding policy for guidance. Talk to a DSL for Safeguarding without delay. If they are implicated, then talk to your Additional Senior Lead

CONSULT,
MONITOR
AND RECORD
Sign/Date/Time
Include name and
job role

# **Step Three:**

The Lead, Deputy or Additional Senior Lead should refer the concern to the relevant adult's or children's social care service and/or the Police and follow up the referral in writing within 24 hours.

**For England and Wales**, in cases of allegations against a "person of trust" with a "duty of care" towards a child, the Local Authority Designated Officer (LADO) will co-ordinate the next procedural steps.

Under "whistle blowing", anyone can refer directly to the Police, social care services, LADO, the Charity Commission, Protect or the NSPCC (child concerns only) when they are concerned the organisation is not managing safeguarding concerns appropriately.

Any consultations should not delay a referral.

In an emergency do not delay: dial 999

When the concern is about the welfare of a child or adult at risk from schools, colleges, health providers, GP practices, prisons or social care settings, you should refer to that organisation's Lead for Safeguarding in the first instance. Inform the Lead or Deputy of your organisation that you have referred a concern.



#### **Record Keeping**

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records which are:

- recorded on a safeguarding incident form
- of sufficient details of child, young person or adult at risk to identify individual who is subject of concern and any significant others
- accurate and factual/based on fact, as a true record of:
  - o what has been monitored/observed
  - o what has been said and by whom
  - what has given cause for concern
  - o what action has and/or will be taken including the reason for those actions
  - the reason stated for no action being taken and by whom
- non judgmental
- timely within 24 hours
- · signed and dated by the writer and co-signed by the Lead or Deputy
- shared as appropriate by the Lead or Deputy for Safeguarding
- stored safely and securely by the Lead or Deputy for Safeguarding

#### Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Our policies and procedures are in line with the statutory guidance, **the relevant Regulatory Authorities**, **see above**, guidelines, our disciplinary, complaints and grievance procedures. These will be made available to everyone.

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice, the Lead or Deputy will, in all cases, discuss the situation with social care services (the LADO with regards to children England and Wales only) and / or the police before making an open decision about the best way forward.

In the case where the Lead is implicated, the Deputy should be informed. In the exceptional circumstances that both are involved, the person concerned will inform the Senior Lead. If there is a belief that the concern has not been taken seriously or acted upon then any one can "Whistleblow" With regards to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with social care services and / or the police, (the LADO, with regards to children England and Wales only). Any investigation will override the need to implement any such procedures. Our management are responsible for:

Reporting serious incidents to the Charity Commission (<a href="https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity">https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity</a>)

And/or Ofsted (https://www.gov.uk/guidance/report-a-serious-childcare-incident)



And reporting individual personnel to the DBS and, if a registered FA coach, to the FA when requested by the LADO.

#### **Bullying and Harassment**

Bullying and harassment can take many forms and include:

- physical violence including threats, verbal assaults and taunts, the destruction of property, extortion, unwanted sexual interest or contact
- indirect forms of bullying including ignoring a person and the withdrawal of friendship, malicious gossip and spreading rumours, abusive or oppressive graffiti, the use of social media, electronic messages and websites.
- it is often motivated by prejudice against certain groups for example on the grounds of race, religion, gender and disability

Whether directed at children, young people, adults at risk, staff, volunteers, parent and carers, bullying and harassment, physical and/or emotional abuse will not be tolerated. All such behaviour will be treated as a safeguarding concern when aimed at children, young people and or adults at risk. If children, young people and/or adults at risk are engaging in bullying or harassment it is also a safeguarding concern and should be reported to the Lead or Deputy for safeguarding.

#### We will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying or harassment
- report all incidents of bullying or harassment observed or disclosed, to the Lead or Deputy who will take the appropriate action
- take immediate steps to stop the behaviour and mitigate the effects of bullying and harassment
- record all incidents with observations and witness statements, and action taken, signed, timed and dated

# eSafety

#### Why do we need to include eSafety?

Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy



#### **eSafety Code of Conduct:**

We expect everyone in our organisation to agree and sign up to our eSafety code of conduct to:

- 1. use the internet and other forms of communication in a sensible and polite way.
- 2. only access websites, send messages or access and use other resources that will not hurt or upset anybody.
- 3. seek permission if they want to use personal information or take photographs of other people.
- 4. report any concerns to the Lead or Deputy
- 5. not maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk.

#### What are the Risks?

There are many potential risks including:

- accessing inappropriate or illegal websites.
- receiving unwanted or upsetting texts, e-mail messages or images.
- being "groomed" by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
- sharing nudes or semi nudes.
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials etc.
- overspending on shopping and gambling sites.
- being at risk of identity fraud for money transactions.
- inappropriate relationships or prostitution.

#### What else might be of concern?

#### A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting.
- will not let you see what they are accessing online.
- is using a webcam in a closed area, away from other people.
- is accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it.
- receives unexpected money or gifts from people you don't know.
- does not appear to have the money they should have.

#### A person who:



- befriends a child, young person or adult at risk on the internet or by text messaging.
- has links to children, young people and/or adults at risk on their social media pages especially if they
  work in a position of care such as a sports coach or care worker.
- is secretive about what they are doing and who they are meeting.

#### What do I do if I am concerned?

If you have any concerns, speak to the Lead or Deputy for Safeguarding. Remember:

- do not delay.
- · do not investigate.
- seek advice from the Lead or Deputy
- · make careful recording of anything you observe or are told



## eSafety Referral Flowchart - Child and Adult

When illegal content or activity is found or suspected, if an emergency dial 999, always inform your Lead or Deputy for safeguarding and s/he will follow these steps:



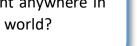
Is a crime in progress or is anyone in immediate danger?







Is the concern about criminally obscene adult or child content anywhere in the world?





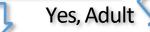


Contact the Internet Watch Foundation www.iwf.org.uk



Is the concern about a person communicating with an adult at risk (who can't consent) or a child for sexual reasons?







**Contact CEOP** (Child Exploitation and Online Protection Centre) www.ceop.police.uk



Is the concern about a known person, non-sexual harassment or other potential crime?





Contact the local police











Inform the Lead for Safeguarding (or Deputy if unavailable) who will liaise, await response, and review eSafety arrangements as necessary.



#### Minimising the Risks

We will:

- talk to children, young people and adults at risk about what they are accessing online.
- ensure everyone uses PCs, iPads and other technology in a general space where we can monitor what
  is going on.
- explain the risks of giving out personal details online.
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school.
- encourage children, young people and adults at risk to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate.
- advise children, young people and adults at risk to only text, chat or webcam to people they know in real life.
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- discuss how people hide their identities online and the importance of never meeting new online "friends" in real life.
- make sure children, young people and adults at risk understand they can always talk to us, or their parents and/or carers, about anything that makes them feel uncomfortable.
- look on the internet together for information about how to deal with or report problems. e.g. Thinkuknow
- talk about how/when information or images get on to the internet, they can never be erased.

# **Safeguarding Practical Guidance**

#### **Photography & Filming Guidance**

Both still and moving images are key to recording the successes and achievements of children, young people and adults at risk in their lives and activities. However, it is vital to remember that images (especially digital images) can be used, shared, stored and/or distributed inappropriately, and that their storage and use must comply with the UK GDPR.

It is therefore important to be clear about:

 obtaining permission from a child's, young person's or adult at risk's legal guardian prior to capturing or posting an image containing said individual with an explanation of how it is being used.



- explaining to parents and carers why caution is necessary
- the purpose of images e.g. parent's and carer's own record, media and publicity etc
- the content required when using a professional photographer
- informing parents and seeking their consent for any publication or media use
- publishing only necessary identifying details alongside individual's photos in newspapers, websites etc
- taking photographs openly and away from sensitive areas (changing rooms, toilets, etc)
- the suitability of clothing e.g. swimsuits
- any group photos being taken only during the activity or on the premises
- all those taking photos signing a registration form, which also identifies the purpose and use of any images
- ensuring secure storage of all images
- identifying how long unused images will be retained
- · identifying how long copies of published images will be retained

The above guidance applies to all still and moving images, however they are created (mobile phone, still camera, video camera etc). The type of equipment and the equipment's owner should also be recorded on the registration form.

#### **Transport**

We ensure that we:

- gain written permission from parents or carers to carry children, young people and adults at risk
- keep a register of who is being transported and who is driving, when to where and return, with collection and return times being specified
- provide all transporting and being transported with an emergency contact numbers
- plan journeys regarding time, distance and stopping points
- consider if another driver might be required or the possible need for extra supervision
- have emergency procedures in place

and we ensure that drivers:

- are recruited under safeguarding recruitment procedures
- are suitably qualified to drive the required vehicle
- provide proof of insurance regarding business use and comprehensive insurance
- can evidence the vehicle is roadworthy and suitable for transporting each individual
- provide suitable and age appropriate seat belts, booster seats and wheelchair anchor points



avoid transporting children, young people or adults at risk on their own

#### Activities, Events and Visiting Speakers/Activity Leaders

We will always ensure visitors and activities undertaken are risk assessed and we are committed to:

- ensuring that those who run activities have the expertise, knowledge and skills to do so properly
- completing a risk assessment which involves identifying risks and the means of reducing or eliminating those risks for all activities or events
- risk assessing any changes being made to activities or events involving children, young people and adults at risk
- having a written plan in place if the event or activity has to be cancelled
- having a written plan in place in case of emergency including contact numbers
- implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis

#### The Late Pick Up of a Child, Young Person or Adult at Risk

If attempts to contact the parent and nominated emergency contact fail, then the supervising adult should wait with the child, young person or adult at risk with other staff, volunteers or parents wherever possible.

Staff, paid and unpaid, should avoid:

- taking the child, young person or adult at risk home or to another location
- waiting alone with the child, young person or adult at risk in a vehicle or at the venue
- sending the child young person or adult at risk home with another person, without parental consent
- leaving the child young person or adult at risk alone.

If all attempts to make contact fail, it may be advisable to contact the police for advice.

#### Child, Young Person or Adult goes Missing

If a child, young person or adult at risk goes missing from the group or organisation it should be reported to the police. Use 999 where there is a concern that they cannot be found or are vulnerable.

A missing person may be assessed as 'at risk' if they fit one or more of the following categories.

- is under 16
- has expressed feelings of suicide
- has dementia
- has been acting totally out of character
- has mental health issues
- is under increased stress



- has an illness or a physical disability
- has a learning disability
- is in need of regular medication/care

The Lead or Deputy for Safeguarding should be informed as soon as possible, and all details and actions recorded dated timed and signed.

#### First Aid

Our First Aiders have completed specific training as set out by the Health and Safety Executive (HSE). They hold valid and up to date certificates of competence issued by an organisation whose training and qualifications are approved by the HSE.

The duties of a First Aider are:

- to give immediate first aid to children, young people, adults at risk, staff or visitors when needed
- to ensure that an ambulance or other professional medical help is called when necessary

Our organisation undertakes to ensure there is always a trained First Aider on site at our venues or, if other venues used such as schools, that they have appropriate first aid cover.

We also provide training and guidance on dealing with hazardous materials such as blood, other bodily fluids and chemicals. We ensure sufficient equipment is available to deal with accidents or spillage.

All incidents will be reported and recorded in the First Aid and Incident Accident Books

#### **Buildings and Venues**

Safeguarding risk assessments will be carried out on all building and venues used by our organisation or by the host's venue management, such as schools

The safeguarding risk assessment should cover:

- access especially how people enter and leave the building
- signing in protocol
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- any other relevant issues

#### **Ethical fundraising**

We are committed to our fundraising being:



- Legal: All fundraising must meet the requirements of the law.
- **Open:** Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if they are asked for more information.
- **Honest:** Fundraisers must act with integrity and must not mislead the public about the cause they are fundraising for or the way a donation will be used.
- **Respectful:** Fundraisers must demonstrate respect whenever they have contact with any member of the public.

#### **SAFEcic Recommendations**

In order to attain the highest standards of safeguarding practice, everybody needs to be vigilant in adhering to this policy and also assessing the risks of their own work and activities. These risk assessments will be carried out annually by the Lead and/or Deputy. However, it is the responsibility of everyone to draw attention to practices and procedures that they are unhappy or uncomfortable with.

It is only through adopting SAFEcic policies and practices that we can all be confident we have done everything we can to safeguard the children, young people and adults at risk in our care.

# **Policy Date**

This policy was agreed and disseminated on 21<sup>st</sup> February 2023 and will be reviewed annually or when there are substantial organisational changes.

Policy Review Date: 03/07/2024

Head of Safeguarding and Governance: Peter Marment

**Deputy Designated Safeguarding Lead: Benedict Barbour** 

Senior Lead for Safeguarding: Charlie Hyman

Date of next review: 03/07/2025

Page 28 of 28